

Dear Mr. Lippman:

Thank you for your comments during the Mississippi River Commission public meeting held in Morgan City, Louisiana, on August 23, 2001. In your statement you discussed several items of concern to the Port of Morgan City.

The Atchafalaya River and Bayous Chene, Boeuf, and Black Reconnaissance Study is scheduled for completion in September 2001. In this study, the Corps is addressing the feasibility of deepening the navigation project to depths of up to 35 feet, based on navigation benefits. If the conclusions of this preliminary analysis are that a deeper channel is economically justified and environmentally acceptable, the Corps would proceed to the more detailed feasibility studies to further develop the plan. Flood control benefits will also be considered in the feasibility study.

The Corps dredges the channel to a bottom elevation of -24 feet mean low gulf (MLG). This is done by accounting for 2 feet of advance maintenance and by allowing the dredge 2 feet of overdepth. Due to the rapid return of light, suspended sediments, or "fluff," into the bar channel, the New Orleans District is considering additional advance maintenance to avoid frequent dredging. Prior to authorization and approval of additional advance maintenance, a cost analysis must be performed to ensure the least overall cost of maintaining the project. To address this, the U.S. Army Corps of Engineers' Engineer Research and Development Center (ERDC) in Vicksburg, Mississippi, is conducting a study to evaluate the effects of fluff on the channel and means of improving the operability of the channel. The 15-month study is designed to determine, among other things, whether dredging deeper will result in keeping the layer of fluff below the authorized channel depth and how rapidly the fluff returns to the channel following maintenance dredging. While awaiting the results of the ERDC study, the Corps has implemented two interim solutions to minimize the fluff problem. First, the number of dredging

events in the bar channel was increased this fiscal year from two to three. Second, the Corps is investigating use of an interim disposal site to the west of the navigation channel.

There are several pipelines that cross the bar channel at skewed angles, resulting in the pipelines occupying a longer "effective length" of channel than if the crossings were perpendicular to the channel. The top-of-pipe elevations are as shallow as -27 feet MLG. As a result, the Corps cannot dredge to the usual -24 feet MLG over the effective length of channel crossing. The analysis of additional advance maintenance that the Corps is performing will include the cost of relocating these pipelines.

In regard to your comments about a new (interim) disposal area for dredged material, the existing disposal area for bar channel maintenance dredging is located to the east of the navigation channel. We recognize the Port's concern that the near-shore currents, which move from east to west, transport the dredged material from the disposal area back into the channel. The New Orleans District is investigating using an interim disposal site to the west of the navigation channel under Section 103(b) of the Marine Protection, Research, and Sanctuaries Act of 1972.

The Commission recognizes the Port's efforts in its study showing economic justification of a 35-foot channel. However, if one of the purposes of the economic analysis is to seek authorization of a Federal project to provide a deeper channel, the study must identify the National Economic Development (NED) benefits. NED benefits are those that accrue to the nation, not just to a specific region. Under current guidelines and procedures, the Corps may only use NED benefits to justify a Federal project. Other benefits may be derived in a study so that all stakeholders may see the regional benefits. Procedures for analyses of NED benefits can be found in the October 1991 National Economic Development Procedures Manual developed by the Inland Waterways Institute.

Thank you again for your presentation. The Commission appreciates receiving your comments and looks forward to hearing from you at our future public meetings.

Sincerely,

Edwin J. Arnold, Jr.
Brigadier General, U. S. Army
President Designee, Mississippi
River Commission